

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KEWAZINGA CORP.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 1:20-cv-1106-LGS

JURY TRIAL DEMANDED

**DEFENDANT GOOGLE LLC'S NOTICE OF MOTION FOR SUMMARY JUDGMENT
OF EQUITABLE ESTOPPEL**

PLEASE TAKE NOTICE that on a date and time to be set by the Court, Defendant Google LLC will move before the Honorable Lorna G. Schofield, U.S.D.J., at the United States Courthouse for the Southern District of New York, 40 Foley Square, New York, New York 10007, pursuant to Rule 56 of the Federal Rules of Civil Procedure, for entry of an order granting summary judgment of equitable estoppel in favor of Defendant Google LLC and against Plaintiff Kewazinga Corp. on all of Plaintiff Kewazinga Corp.'s claims.

PLEASE TAKE FURTHER NOTICE that in support of this motion Defendant Google LLC will rely upon the accompanying Memorandum of Law, Declaration of Daniel Filip with exhibits, Declaration of Stafford Marquardt with exhibits, Declaration of James F. Sherwood with exhibits, and Local Rule 56.1 Statement of Undisputed Material Facts.

Dated: July 15, 2020

Respectfully submitted,

By: John M. Desmarais
John M. Desmarais

DESMARAIS LLP
John M. Desmarais
jdesmarais@desmaraissllp.com
Ameet A. Modi
amodi@desmaraissllp.com
Steven M. Balcof
sbalcof@desmaraissllp.com
Elizabeth Weyl
eweyl@desmaraissllp.com
David A. Frey
dfrey@desmaraissllp.com
230 Park Avenue
New York, NY 10169
Tel: 212-351-3400
Fax: 212-351-3401

Emily Chen (*pro hac vice*)
echen@desmaraissllp.com
101 California Street
San Francisco, California 94111
Tel: (415) 573-1900
Fax: (415) 573-1901

Counsel for Defendant Google LLC